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16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

18 CALIFORNIA COALITION FOR WOMEN  
19 PRISONERS; et al.,

20 Plaintiffs,

21 v.

22 UNITED STATES OF AMERICA; UNITED  
23 STATES OF AMERICA FEDERAL BUREAU OF  
24 PRISONS, et al.,

25 Defendants.

26 Case No. 4:23-cv-04155

27 **DECLARATION OF VICTORIA  
LAW IN SUPPORT OF MOTION  
TO INTERVENE FOR LIMITED  
PURPOSE OF UNSEALING COURT  
RECORDS AND PROTECTING  
ACCESS TO PUBLIC  
PROCEEDINGS**

28 Judge: Yvonne Gonzalez Rogers

Date: July 16, 2024

Time: 2:00 p.m.

Courtroom: 1 (Fourth Floor)

## DECLARATION OF VICTORIA LAW

I, Victoria Law, declare under penalty of perjury as prescribed in 28 U.S.C. § 1746 that the following is true and correct:

1. I am a freelance journalist. I primarily write about the intersection of mass incarceration and gender, and have published with outlets including The New York Times, The Nation, The Guardian, The Appeal, and Al-Jazeera America. I have also written and edited books on these subjects, including Resistance Behind Bars: The Struggles of Incarcerated Women (PM Press 2009), Prison By Any Other Name (New Press 2020), and Corridors of Contagion (Haymarket Books 2024).

2. I have also worked with incarcerated women as an editor. From 2003 to 2020, I edited *Tenacious: Art and Writings by Women in Prison*, a print periodical.

3. I have a BA from Brooklyn College at the City University of New York, and I have received many honors and awards for my reporting. For example, I was a finalist for the New York Public Library Helen Bernstein Award for Excellence in Journalism (2020), I received the bronze medal for current events from the Independent Publishers Book Award (2020), I was an honoree for adult nonfiction by the Society of Midland Authors Annual Literary Award (2020), and I received the PASS (Prevention for a Safer Society) Award from the National Council on Crime and Delinquency, National Council on Crime and Delinquency (2009). I have received multiple fellowships to support my reporting, including the Justice and the Pandemic Fellowship from the Center on Media, Crime and Justice at John Jay College (2020), the John Jay/Langeloth Foundation Fellowship for reporting on solitary confinement (2018), a fellowship from the Leonard C. Goodman Institute for Investigative Reporting to investigate pregnancy behind bars for *In These Times* magazine (2015), and the “Health Behind Bars” Fellowship (Langeloth Health Journalism Fellow) from the Center on Media Crime and Justice, John Jay College of Criminal Justice (2013).

4. From my years of experience reporting on jails and prisons, I know that open access to court records and court hearings is essential for public understanding of how these institutions function, which in turn encourages political accountability.

1       5. Public access is especially important to shed light on the experiences of incarcerated women,  
 2 which are often overlooked in public reporting and debate about prisons and jails, even though the  
 3 population of incarcerated women in America has increased dramatically in recent decades.

4       6. I have written a number of articles about the experiences of women at the Federal  
 5 Correctional Institution, Dublin (FCI Dublin) and the ongoing legal proceedings about the alleged  
 6 abuses at the facility, including for The Appeal and Truthout. For example, last summer I wrote a  
 7 lengthy article about women who faced deportation after speaking up about sexual abuse at FCI Dublin.  
 8 See Victoria Law, “These Survivors Rooted out Sexual Abuse in Federal Prison. Now They Face  
 9 Deportation,” The Appeal (June 3, 2023), <https://theappeal.org/fci-dublin-u-visas-sexual-abuse-deportation/>.

11       7. My articles include details not only about staff sexual abuse and retaliation, but also the  
 12 administrative changes that have been implemented at a dizzying speed and have not been explained to  
 13 the general public. See, e.g., Victoria Law, “Prison Notorious for Rape Is Slated for Closure But Not  
 14 Releasing Survivors,” Truthout (Apr. 15, 2024), <https://truthout.org/articles/prison-notorious-for-rape-is-slated-for-closure-but-not-releasing-survivors/>.

16       8. I plan to continue to report on FCI Dublin and the women, previously incarcerated there, who  
 17 have been transferred to other prisons across the country. Since the sudden closure, I have received  
 18 messages from several women that, upon arrival at other prisons, staff have subjected them to retaliatory  
 19 statements, threats, and actions. Unsealed information could provide context for the messages I have  
 20 received and could further expose the difficulties that women experienced at FCI Dublin and continue to  
 21 experience after transfers to other prisons.

22       9. Because many of the defendant’s motions to seal in this case are themselves under seal, it is  
 23 hard for me to know exactly what information has been withheld from the public docket. But, based on  
 24 context provided by other filings, I understand that the information that is under seal in this case may  
 25 explain more about the conditions at FCI Dublin and/or the transfer of women from FCI Dublin to other  
 26 prisons.

27       10. These are, in my view, matters of pressing public concern on which I am eager to report.

28       I declare under penalty of perjury that the foregoing is true and correct.

1 Executed on June 7, 2024, in New York, New York.  
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*Victoria Law*

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Victoria Law  
Freelance Journalist